

Honorable Christopher M. Alston  
Chapter 7  
Hearing Date: November 17, 2022  
Time: 9:30 a.m.  
Hearing Location: Seattle, WA  
Response Date: November 10, 2022

UNITED STATES BANKRUPTCY COURT  
FOR THE WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

In re

UniEnergy Technologies LLC,

Debtor.

Case No. 21-11903-CMA

NOTICE OF MOTION TO APPROVE  
TRUSTEE'S SETTLEMENT WITH  
VANADIS POWER, B.V. AND  
VENTURE LENDING & LEASING  
VIII, INC.,

PLEASE TAKE NOTICE that Edmund J. Wood as trustee ("Trustee") for the Chapter 7 bankruptcy estate of UniEnergy Technologies LLC ("Debtor"), has filed a motion (the "Motion") to approve a settlement with Vanadis Power, B.V. ("Vanadis") and Venture Lending & Leasing VIII, Inc. ("WTI"). The settlement will return personal property to the bankruptcy estate, which was foreclosed by WTI and purchased by Vanadis at a private Article 9 foreclosure sale on August 24, 2021 and will grant a secured claim to WTI in the personal property returned to the estate in the sum of \$1,781,722.09. The Trustee is giving a release to Vanadis and WTI of all claims associated with the foreclosure sale. The Trustee will then market and sell the personal property returned to the bankruptcy estate.

1 The motion is set for hearing as follows:

2 **JUDGE: Christopher M. Alston TIME: 9:30 a.m.**  
3 **PLACE: United States Courthouse DATE: November 17, 2022**  
4 **700 Stewart Street**  
5 **Courtroom 7206**  
6 **Seattle, WA 98101**

7 Copies of the Motion and supporting documents are on file and may be examined by  
8 creditors or other interested parties in the office of the Clerk of the U.S. Bankruptcy Court, 700  
9 Stewart St., Seattle, Washington. If you want a copy of any of one or more of these documents,  
10 you must send a written request to Foster Garvey PC, Attn: Deborah A. Crabbe, 1111 3rd Ave,  
#3000, Seattle, WA 98101.

11 **IF YOU OPPOSE** the Motion you must file your written response with the court clerk,  
12 serve two copies on the Judge's chambers and deliver one copy on the undersigned **NOT**  
13 **LATER THAN the Response Date** which is **on or before November 10, 2022.**

14 **IF NO RESPONSE IS TIMELY FILED AND SERVED**, the Court may, in its  
15 discretion, **GRANT THE MOTION, WITHOUT FURTHER NOTICE**, and strike the  
16 hearing.

17 DATED this 20<sup>th</sup> day of October, 2022

18 **FOSTER GARVEY P.C.**

19 /s/ Deborah A. Crabbe

20 Deborah A. Crabbe WSBA #22263

21 1111 Third Avenue, Suite 3000

22 Seattle, WA 98101

23 Telephone: (206) 447-5325

24 Email: [deborah.crabbe@foster.com](mailto:deborah.crabbe@foster.com)

25 Attorneys for Edmund J. Wood as trustee for the  
26 bankruptcy estate of UniEnergy Technologies  
LLC